



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

Alaska Operations Office
Room 537, Federal Building
222 W. 7th Avenue, #19
Anchorage, Alaska 99513-7588

September 23, 2011

MEMORANDUM

SUBJECT: Air Compliance Inspection Report for
Seward Coal Terminal, Seward, Alaska

FROM: John Pavitt *JP*
Inspector (AOO/A)

TO: Laurie Kral
CAA Data Manager (AWT-107)

Attached to this cover memo, please find my air compliance inspection report for the Seward Coal Terminal, located in, Seward, Alaska. The facility is owned by the Alaska Railroad Corporation and operated by Aurora Energy Services. I inspected the facility on August 15, 2011.

This was an EPA lead inspection, full compliance evaluation (FCE) in response to public complaint, Note that I was joined by EPA R10 Inspector Dave Terpening, who conducted an NPDES compliance inspection at the same time (report prepared under separate cover).

The facility is a minor source, subject to the Alaska SIP Prohibition on fugitive dust.

Please call me at (907) 271-3688 if you have any questions about this report.

Received
SEP 29 2011
Office Of Air, Waste
And Toxics



Printed on Recycled Paper

ENFORCEMENT CONFIDENTIAL

Air Compliance Inspection Report: Seward Coal Terminal, Seward, AK 08/15/11

Page 1 of 9

FACILITY NAME:	Aurora Energy Services Seward Coal Terminal
FACILITY ADDRESS:	903 Port Ave. Seward, AK 99664
FACILITY OWNER:	Alaska Railroad Corporation P.O. Box 107500 Anchorage, AK 99510
FACILITY OPERATOR:	Aurora Energy Services 903 Port Ave. Seward, AK 99664
INSPECTION DATE:	August 15, 2011
NAICS CODE	48311 – Deep Sea Freight Transport
AFS NUMBER ¹	N/A
PERMIT NUMBER	N/A
SITE CONTACTS:	
Aurora Energy Contacts:	Robert Brown, General Manager (907) 378-3529 Vic Stoltz, General Foreman
Alaska Railroad Contacts:	Paul Farnsworth, Director, Facilities (907) 265-2540 Matt Kelzenberg, Manager, Environmental Operations (907) 265-2384
EPA CAA INSPECTOR	John Pavitt Alaska Operations Office (907) 271-3688
EPA NPDES INSPECTOR	Dave Terpening R10, Office of Compliance and Enforcement Inspection and Enforcement Management Unit (206) 553-6905

¹ An AFS number was not found on ECHO Database as of 9/21/11. However, a FERS number was found for the prior owner, Suneel Alaska Corp. That number is EPA Registry Id: 110010418468

WEATHER: Cloudy, wind 10-15 mph (N,NW), 65 °F.

INTRODUCTION:

The purpose of this inspection was to evaluate compliance with the Clean Air Act and to observe for potential fugitive dust in response to public complaints. Note that a separate Clean Water Act compliance inspection was conducted by EPA Inspector Dave Terpening during this site visit (report prepared separately).

The Seward Coal Terminal (the facility) is a coal handling facility located adjacent to the boat harbor and a cruise ship dock in Seward, Alaska. It is owned by the Alaska Railroad Corporation (ARR) and operated by Aurora Energy Services (AES). Coal is received by rail car, unloaded and moved by conveyor belts and stacked in two large piles. Coal is then pulled off of the storage piles by a "reclaimer" system, placed back onto conveyor belts and loaded onto ships in Resurrection Bay for transport to customers worldwide.

The facility is not required to apply for a State air quality operating permit from the Alaska Department of Environmental Conservation (ADEC). However, it is subject to the Alaska State Implementation Plan (AK SIP) requirement to take "reasonable precautions" to prevent fugitive dust from bulk material handling (18 AAC 50.045(d))².

In August 2004, EPA Region 10 determined the facility is not subject to New Source Performance Standards for Coal Preparation and Processing Plants (NSPS Subpart Y). (See Attachment 3) However, EPA Region 10 has received a number of complaints from local residents regarding fugitive dust from coal storage and handling at the facility. At least one resident believed that the facility had changed the way in which it operates. Because EPA revised NSPS Subpart Y in 2009, this inspection was conducted to verify whether the facility continues to not be subject to the subpart, as well as to observe what precautions are being taken to prevent fugitive dust.

As revised, Subpart Y applies to the following operations at Coal Preparation and Processing Plants:³

- Thermal Dryers
- Pneumatic Coal Cleaning (Air Tables)
- Coal Processing & Conveying Equipment
- Coal Storage Systems
- Transfer and Loading Systems
- Open Storage Piles

Under the rule *coal preparation and processing plant* means "any facility (excluding underground mining operations) which prepares coal by one or more of the following processes: breaking, crushing, screening, wet or dry cleaning, and thermal drying." (40 CFR § 60.251)

² Fugitive dust prohibition approved by EPA and federally enforceable. See 72 Fed. Reg. 45378, dated 8/14/07.

³ 74 Fed. Reg. 51950, dated 10/8/09.

COMPLIANCE HISTORY:

On May 3, 2010 ADEC signed a Compliance Order by Consent (COBC) with the facility owner (Alaska Railroad Corporation) and operator (Aurora Energy Services) to address recurring dust complaints from area residents. The COBC is in effect for two years and includes standard operating procedures (SOP) and specific Supplemental Environmental Projects to add water spray to key points in the process to diminish dust. (See Attachment 4.) Under the COBC, the facility was required to monitor for fugitive dust on a regular basis, to set up a public complaint hotline and e-mail in box, to keep a compliant log and provide copies of all complaints to the State, and to submit semiannual progress reports to ADEC. Prior to this inspection, I met with ADEC air compliance program staff and management to review the semiannual reports submitted by the facility, and also discussed their on-site inspections in February and December 2010. Based on the reports and inspections, ADEC had determined the facility was complying with the COBC.

THE INSPECTION:

EPA Inspector Terpening and I arrived at about 10:45 a.m. We entered the office for Aurora Energy Services and signed their visitor's log.

OPENING CONFERENCE:

We met with representatives from ARR (Matt Kelzenberg and Paul Farnsworth) and AES (Robert Brown and Vic Stoltz). Mr. Terpening and I presented our inspector credentials and explained the scope of our inspections. I said my inspection was focused on compliance with Clean Air Act (CAA) regulations as well as the AK SIP requirement to take precautions to prevent fugitive dust. Mr. Terpening said his inspection was focused on compliance with Clean Water Act (CWA) requirements. We said we would be writing separate inspection reports, for review within EPA Region 10.

I asked who owns the facility. The facility representatives said that Alaska Railroad owns the facility, and Aurora Energy Services operates it. I asked how often a ship comes in for a load of coal. They said a ship comes in about every three weeks, with different ships at different times.

Mr. Brown gave us an overview of the facility, pointing to a labeled aerial photo of the Seward Coal Facility. (See Attachment 2). He said that they use water spray bars, sprinklers and fog sprayers at various points in the coal unloading building, storage piles and conveyor lines to prevent dust. These locations were clearly marked on the aerial photo. He also pointed out that much of the conveyor line system is partially or fully enclosed.

We asked how long it takes to load a ship, once they begin the process. Mr. Brown said it takes about four days. Ships vary in capacity from 50 – 70,000 tons. He said the coal is shipped to Chili, Korea and Japan, primarily. He said that they receive their coal by rail from the Usibeli Coal Mine in Healy, and that it takes about 48 hours for a train to make a round trip from the mine to the Seward Coal facility.

FIELD INSPECTION:

Following is a description of my tour of the Seward Coal Facility with the representatives from the Alaska Railroad Corp. (Matt Kelzenberg and Paul Farnsworth) and Aurora Energy Services (Robert Brown and Vic Stoltz). The walking tour started at about 11:20 a.m. Mr. Farnsworth said that the area we walked in was all ARR property. Please see Attachment 1, Photo Log, for photos of the operations and equipment described below.

Stormwater Collection Ponds

I saw that the east and west ponds were holding water, which had drained from stormwater and from water sprayed onto the coal piles. I saw several small piles of coal material which had been dredged from the ponds. Vegetation surrounded the ponds, reducing the likelihood that wind would cause fugitive dust from this area. The facility representatives said that water drains from west pond to the east pond. Each pond had a walkway and an outfall.

Coal Storage Piles

I saw a total of 16 water cannons stationed along the outside edges of the two coal storage piles. Mr. Terpening and I asked the facility representatives to turn on one of the water spray cannons for the east pile. They accomplished this by radioing to the control room and having an operator turn it on. The water spray was forceful enough that it arched over the pile and reached the other side. The water was spraying in a fine mist for more effective dust suppression. I looked at the water cannon spray nozzle and saw it was equipped with a pressure gauge, with a maximum pressure limit of 230 psi, however, Forman Vic Stoltz said that in practice, they usually operate at 150 psi. Mr. Farnsworth said they can move the water cannons as needed. Water is stored on site in a water tank, located at the south end of the coal piles.

The facility representatives said the previous owner of the facility had had a fire in the coal pile, and that they work to prevent more fires by compacting the coal with bulldozers and other heavy equipment.

I did not see any dust blowing from this area.

Train Unloading Building

Here, incoming trains pull in and dump loads of coal into 10 hoppers located beneath the building. Mr. Farnsworth said they usually use just hoppers # 1-7. I saw that the building entrance had plastic wind flaps, made of clear plastic that looked tattered and torn. Mr. Brown said they planned on replacing those with strips of used conveyor belt material which are much more durable, which he said demonstrates "part of the continual improvement" for dust at the facility. I did not see any dust blowing from this area.

Conveyor System (BC-1 through 10, BC-11, BC-12, BC-13, BC-14)

We stepped out of the train unloading building and looked at the initial conveyor belts in the conveyor system, designated as belt conveyor, or "BC 1, 2, 3," etc. Mr. Brown pointed out that the water spray bars were heat-traced, meaning the pipes were wrapped with an electric cord

to keep them warm in winter months. He said this was one of the Supplemental Environmental Projects they had committed to doing in their COBC with ADEC.

I saw that scrapers were installed at the conveyor belt transfer points, such as the location where BC-1 through 10 drop coal onto BC-11. The facility representatives said the scraper minimizes the amount of residual coal that would otherwise stick the belt as it returns to the Train Unloading Building. (A conveyor belt is in a continuous loop, and the top surface becomes the bottom surface as it turns and drops coal. Material adhering to the bottom surface could drop to the ground if it were not scraped off.)

The longest stretch of the conveyor system is BC-13, which runs from the north end of the coal pile southwards to the Control Room building. Along this stretch, the belt passes beneath the Stacker/Reclaimer (below), where coal can alternately be pulled from the belt and placed onto storage piles, or pulled off of the pile and placed back onto the belt for ship loading. I saw that rubber flaps were placed along the belt in the locations where the belt moves into and out of the Stacker/Reclaimer, which would help to prevent coal from falling off the belt, or being blown by wind off the belt. I saw that the conveyor belts were enclosed on the bottom and sides with sheet metal, which the facility representatives referred to as "wind walls."

I did not see any dust blowing from this area.

Stacker/Reclaimer

The Stacker/Reclaimer unit is used to move coal onto piles, and to pull it off the piles and back onto the belt system. The unit looks like a large spinning wheel with buckets attached to scoop up coal, or fling it onto the piles. The unit was not operating at the time of our inspection. At our request, the facility representatives started up the water fogging spray bars located at the wheel and bucket area of the unit. I saw that the water fog that sprayed forth was a very fine mist, and encompassed the entire working surface (where the spinning wheel would come into contact with coal). The facility representatives said they had installed twin water tanks, each with a capacity of 12,050 gallons, at the base of the Stacker/Reclaimer.

I did not see any dust blowing from this area.

Ship Loader

We continued our walk, moving south from the Control Room building, along BC-14 to the Ship Loader. The conveyor belt was covered on top and on the sides by half-pipe shaped sheet metal. The half-pipe had holes, measuring approximately 2 inches in diameter evenly spaced approximately every 10 feet for maintenance access. The Ship Loader was not in use at the time of the inspection. When in use, ships tie up at the Ship Loader dock on Resurrection Bay. Coal transfers from BC-14 to a smaller belt connected to a "feeder arm" or chute which is the point at which coal falls to the ship, below. According to the facility representatives, the chute can rotate and is lowered into the hold of the coal ship. As the hold fills with coal, the operator gradually raises the chute to maintain a short dropping distance from the tip of the chute to the pile below.

As we walked the length of the dock, I saw white pans located beneath BC-14, which the facility representatives referred to as "drip pans" to catch coal material which would otherwise fall from the bottom of the belt. I saw that the drip pans extended the entire length of BC-14 which projected out over the water. All of the pans had at least some coal material in them. The facility representatives said they are training staff to come out and use vacuum cleaners to remove coal from the pans as they fill up, but that this was still a new process for them.

I did not see any dust blowing from this area.

Control Room & Records Review

The Control Room is located upstairs from the AES office space. From the Control Room, I looked out windows facing north and could see much of the conveyor belt system. I saw a control board showing the layout of the conveyor belts, train unloading and ship loading areas which the facility uses to monitor belt speed and ship loading progress. It also is used to monitor the status of water sprays. The representatives showed me an addition to the control board which they said would be used to monitor the water spray bars to be installed where BC-11 connects to BC-12. We examined the operator's Log Books. I reviewed a number of daily entries at random, and saw that the operators are writing detailed notes every 15 – 60 minutes on the start up of the conveyor belts, and the appearance of fugitive dust. Reading the accounts, I saw that they were noting whether dust was present and changes in operations to reduce dust. For example, on January 22, 2011, the operator noted several times during the day that there were "dusty conditions" at the Stacker/Reclaimer and at the rail car unloading area. Water spray bars were being turned on at BC-11. Dusty conditions continued, and the facility shut down several of the coal hoppers beneath the rail car unloading area, but eventually stopped unloading after multiple water sprays had been turned on but failed to make a difference. The logs reflected that operators in the control room were staying in contact with workers at the coal pile, train unloading and ship loading areas. (See Attachment 5.)

I also reviewed the facility's semiannual report which had been submitted to ADEC in July 2011. The report included copies of the complaint log, equipment maintenance log and visible dust determinations (Method 21). The Method 21 observation forms on file showed that operators were noting whether there was fugitive dust, how long it lasted, and whether the dust left the property line of the facility. On 1/22/11, the observer noted that dust was leaving the property line, and that the facility's response was to stop unloading coal from rail cars, at approximately 5:15 p.m. (See Attachment 6.)

CLOSING CONFERENCE:

Mr. Terpening and I sat with the facility representatives in the AES office and discussed that day's inspection. I thanked them for their time and cooperation throughout the inspection. Regarding fugitive dust, I said that I had not seen any dust from their operations or from the coal pile that day. I said I had observed a variety of dust control measures that appeared to me to address all areas that I could see needed dust control: water spray and/or water fogging bars at the coal pile and a number of conveyor belt locations; rubber flaps at the conveyor belt entry and exit points; scrapers at the conveyor belt turning points; wind screens on sides of belts, full top and side enclosures over BC-14, and drip pans beneath BC-14. I said we had confirmed on site that the water spray bars and foggers worked upon demand.

I pulled out a copy of NSPS Subpart Y, and read through the applicability section and definitions in the rule. I said I had walked the entire length of their operation from start to finish and had not found any crushing, breaking, screening, drying or cleaning operations. I asked the facility representatives if they process coal by crushing, breaking, screening, drying or cleaning coal. They said they do not.

The facility representatives requested a copy of my inspection report. I said I would make a note of that in my report.

We left the facility at about 3:30 p.m.

SUMMARY:

This on-site inspection reviewed the facility's compliance with the Clean Air Act and State fugitive dust control requirements. The facility was not receiving or loading coal during the inspection.

My inspection documented that there was no observable fugitive dust during the on-site inspection. Winds were 10-15 mph from the N, NW.

My inspection showed that the facility has undertaken a comprehensive approach to controlling dust from coal storage and handling:

- Water fogging and/or spray bars are installed at the train unloading building, at the start of conveyor belt BC-11, at a transfer point along BC-13, and on the stacker/reclaimer unit. Spray bars on the train unloading building are heat-traced for winter operations. The spray bars were tested at random and found to be working.
- The facility is in the process of installing water spray bars at the junction of BC-11 and BC-12.
- Water cannons are installed and functioning at more than one dozen locations along the outer edges of the east and west coal piles.
- Thick vegetation is growing along the northern and western edges of the property line (the sides facing the adjacent boat harbor and town).
- Drip pans have been installed beneath the portion of BC-14 which projects out over Resurrection Bay. The pans had coal fines in them at the time of the inspection, indicating they do catch coal which otherwise would fall into the bay.

Under NSPS Subpart Y, *coal preparation and processing plant* means "any facility (excluding underground mining operations) which prepares coal by one or more of the following processes: breaking, crushing, screening, wet or dry cleaning, and thermal drying." (40 CFR § 60.251) My observations, photographs and interviews with facility representatives show that while the facility is loading, unloading, storing and conveying coal, it does not "prepare" or "process" coal by any of the processes described in the rule. Therefore, I found no information which would reverse EPA's prior applicability determination on August 11, 2004 that the facility is not subject to Subpart Y.

ENFORCEMENT CONFIDENTIAL

Air Compliance Inspection Report: Seward Coal Terminal, Seward, AK 08/15/11

Page 8 of 9

INSPECTOR SIGNATURE / DATE

John Pavitt , 9/23/11

John Pavitt

Date

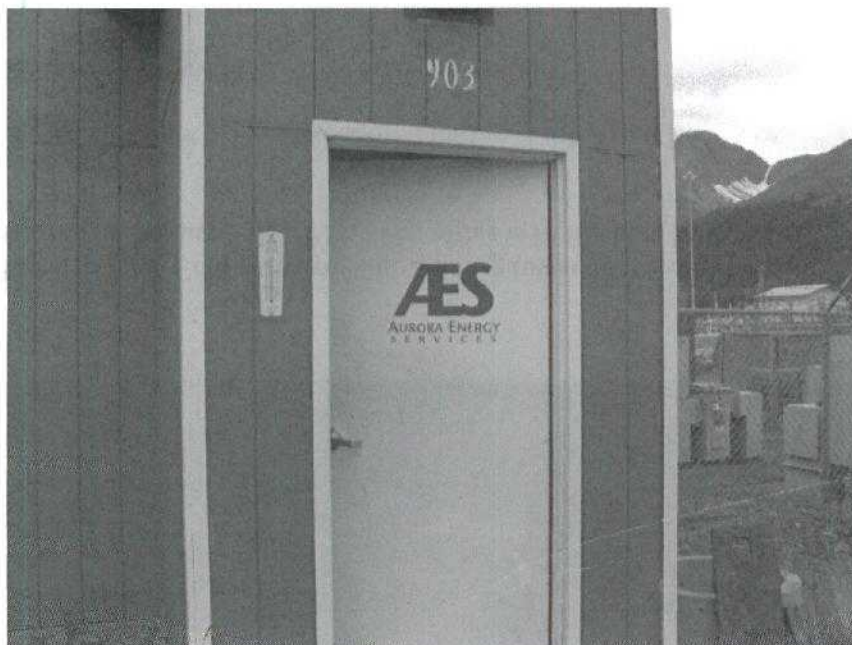
ATTACHMENTS

1. Photo Log. All inspection photos were taken by EPA inspector John Pavitt, Region 10, and were saved onto a read-only compact disc (CD-R) in accordance with EPA Region 10 Standard Operating Procedure, rev. 1.1, and printed for this report. All photos were saved in their original condition on the CD for subsequent viewing as needed.
2. Aerial Photo, provided by Alaska Railroad Corporation, dated 1/17/11. Shows the entire Seward Coal Loading Facility and is labeled with key dust control equipment locations.
3. Letter, dated 8/11/04, from EPA Region 10 to Alaska Railroad Corporation. Re: Applicability Determination Letter, NSPS Subpart Y.
4. Standard Operating Procedures for Fugitive Dust Control, for the Seward Coal Terminal. This SOP was attached to a Compliance Order by Consent (COBC) between the Alaska Department of Environmental Conservation, the Alaska Railroad Corporation and Aurora Energy Services, finalized on 5/3/10.
5. Operator's Log, Seward Coal Terminal, dated 1/22/11. Includes detailed descriptions of fugitive dust observations and control efforts. Included in semiannual report to ADEC.
6. Visible Determination of Dust Emissions (Method 22), dated 1/22/11. Prepared by AES staff. Included in semiannual report to ADEC.

ATTACHMENT 1

PHOTO DOCUMENTATION

Facility: Aurora Energy Services, LLC	Lat/Long: 60.1166/-149.4166	Inspection Date: 08/15/11
Location: Seward Coal Terminal, Seward, AK	Camera: Panasonic/Lumix DMC-FZ8	Photographer: John Pavitt, AOO/A



Description: Front door of the operator, Aurora Energy Services (AES), located at 903 Port Ave., Seward, AK.

Time: 11:15 am **Direction:** Looking south.

Photo No: 1030611



Description: No Trespassing sign posted by facility owner, the Alaska Railroad Corp.

Time: 11:17 am **Direction:** looking north

Photo No: 1030612

PHOTO DOCUMENTATION

Facility: Aurora Energy Services, LLC	Lat/Long: 60.1166/-149.4166	Inspection Date: 08/15/11
Location: Seward Coal Terminal, Seward, AK	Camera: Panasonic/Lumix DMC-FZ8	Photographer: John Pavitt, AOO/A



Description: Coal conveyor line leading towards the ship loading station on Resurrection Bay. The office is in the blue building (R)

Time: 11:17 am **Direction:** looking south, from Port Ave.

Photo No: 1030613



Description: Covered conveyor line, which brings coal from storage piles to the ship loading station. Stormwater settling ponds are seen to the east (right) and west (left) of the conveyor.

Time: 11:18 am **Direction:** looking north, from Port Ave.

Photo No: 1030614

PHOTO DOCUMENTATION

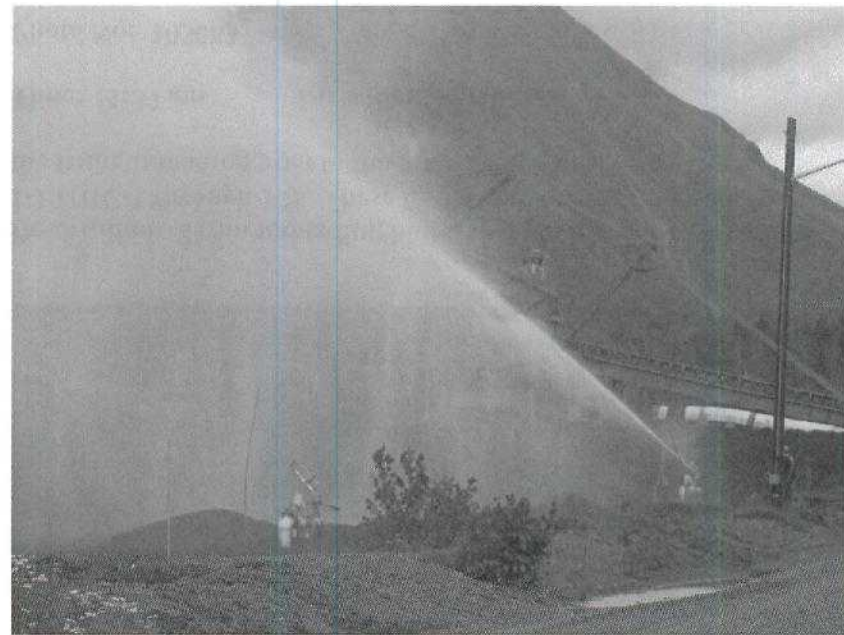
Facility: Aurora Energy Services, LLC	Lat/Long: 60.1166/-149.4166	Inspection Date: 08/15/11
Location: Seward Coal Terminal, Seward, AK	Camera: Panasonic/Lumix DMC-FZ8	Photographer: John Pavitt, AOO/A



Description: Water sprinkler system, operating along the east coal pile. Railroad tracks are to our right. The Train Unloading Bldg is in the distance.

Time: 11:31 am **Direction:** North

Photo No: 1030620



Description: Closer view of water sprinkler shown in previous photo. This was turned on at our request to demonstrate it works.

Time: 11:31 am **Direction:** NW

Photo No: 1030621

PHOTO DOCUMENTATION

Facility: Aurora Energy Services, LLC	Lat/Long: 60.1166/-149.4166	Inspection Date: 08/15/11
Location: Seward Coal Terminal, Seward, AK	Camera: Panasonic/Lumix DMC-FZ8	Photographer: John Pavitt, AOO/A



Description: Water sprinkler nozzle. Pressure gauge shows this sprinkler can operate at up to 230 psi, but the foreman said it usually operates at 150 psi.

Time: 11:33 am **Direction:** NW

Photo No: 103062



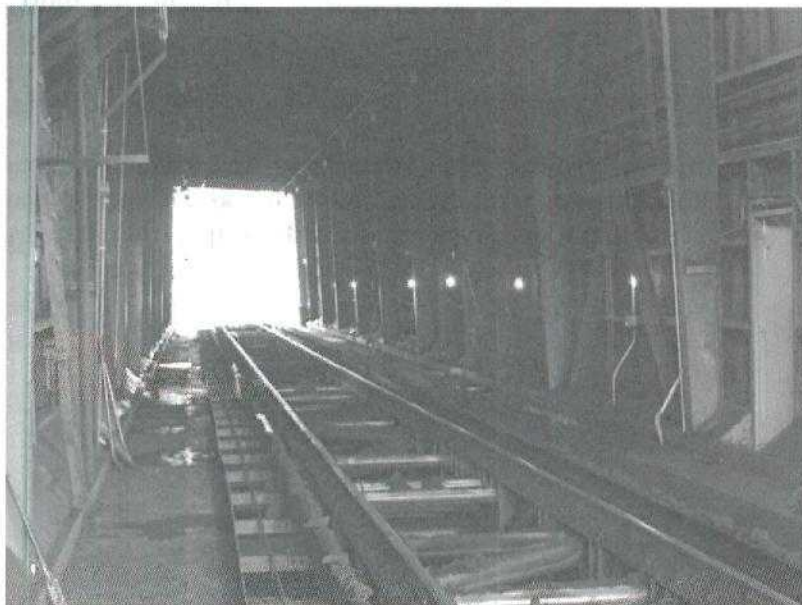
Description: Train unloading building and Belt Conveyor Lines # 1-10 (BC-1 through 10). These initial conveyors move coal from the train unloading area to the main conveyors.

Time: 11:39 am **Direction:** North

Photo No: 103063

PHOTO DOCUMENTATION

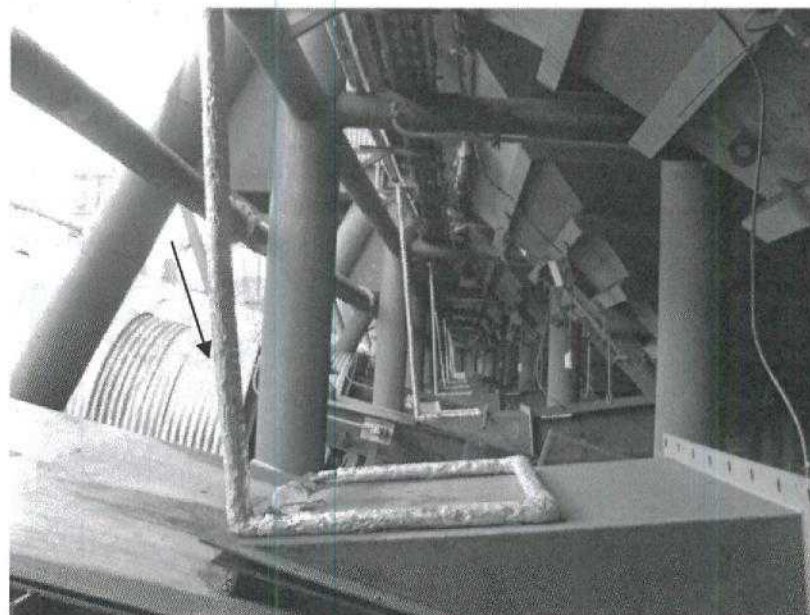
Facility: Aurora Energy Services, LLC	Lat/Long: 60.1166/-149.4166	Inspection Date: 08/15/11
Location: Seward Coal Terminal, Seward, AK	Camera: Panasonic/Lumix DMC-FZ8	Photographer: John Pavitt, AOO/A



Description: Looking inside the Train Unloading Bldg. Trains enter from the north end and drop coal into any of 10 bins, below. The facility plans on installing strips of used conveyor belts at the bldg. entrance to help reduce wind.

Time: 11:43 am **Direction:** North

Photo No: 1030626



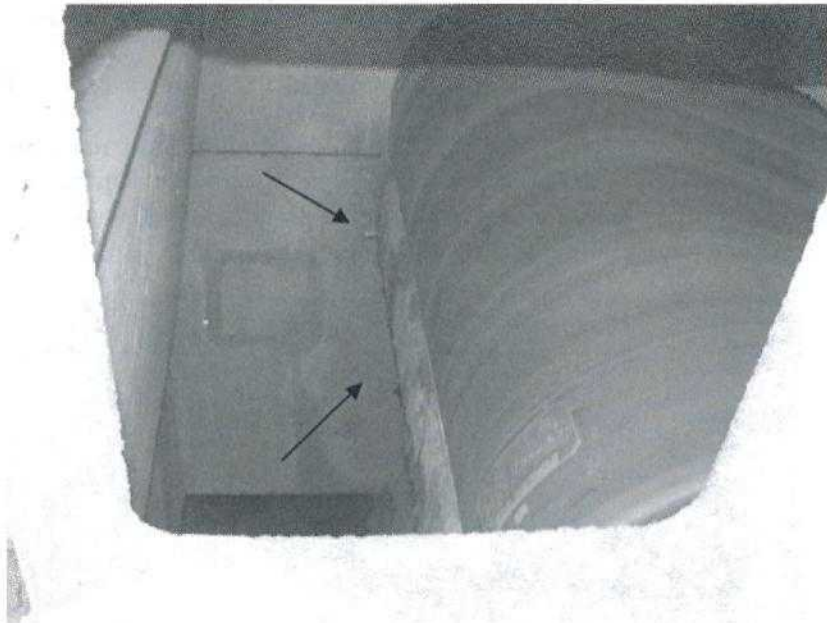
Description: Water spray bar installed at the start of conveyor line BC-1 (where it emerges from underneath the bldg.). Each of the 10 conveyor lines have a water line which is heat traced to prevent freezing.

Time: 11:48 am **Direction:** North

Photo No: 1030628

PHOTO DOCUMENTATION

Facility: Aurora Energy Services, LLC	Lat/Long: 60.1166/-149.4166	Inspection Date: 08/15/11
Location: Seward Coal Terminal, Seward, AK	Camera: Panasonic/Lumix DMC-FZ8	Photographer: John Pavitt, AOO/A



Description: Belt scraper, to removed coal that might stick to the belt as it drops coal to a connected belt. A second scraper is installed beneath the belt after it makes a turn downward.

Time: 11:57 am **Direction:** looking down onto belt BC-1, not operating.

Photo No: 1030629



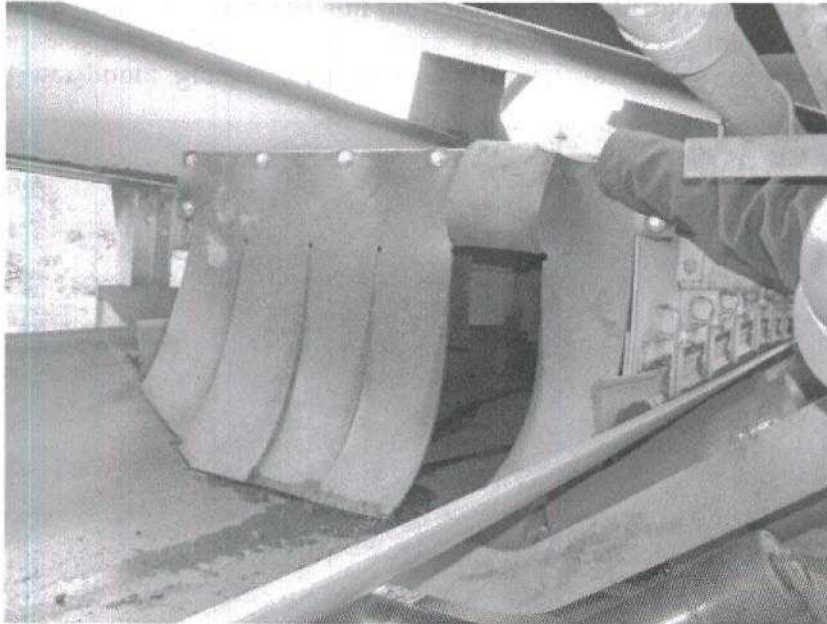
Description: Additional water spray bars, mounted on top of conveyor BC-1. Coal moving forward from here drops onto conveyor BC-11, moving north.

Time: 12:03 pm **Direction:**

Photo No: 1030630

PHOTO DOCUMENTATION

Facility: Aurora Energy Services, LLC	Lat/Long: 60.1166/-149.4166	Inspection Date: 08/15/11
Location: Seward Coal Terminal, Seward, AK	Camera: Panasonic/Lumix DMC-FZ8	Photographer: John Pavitt, AOO/A



Description: Example of dust flaps installed along conveyor line, where coal emerges from a belt-drop area. This is located along the start of conveyor BC-13, moving south.

Time: 12:13 pm **Direction:** N, NW

Photo No: 1030632



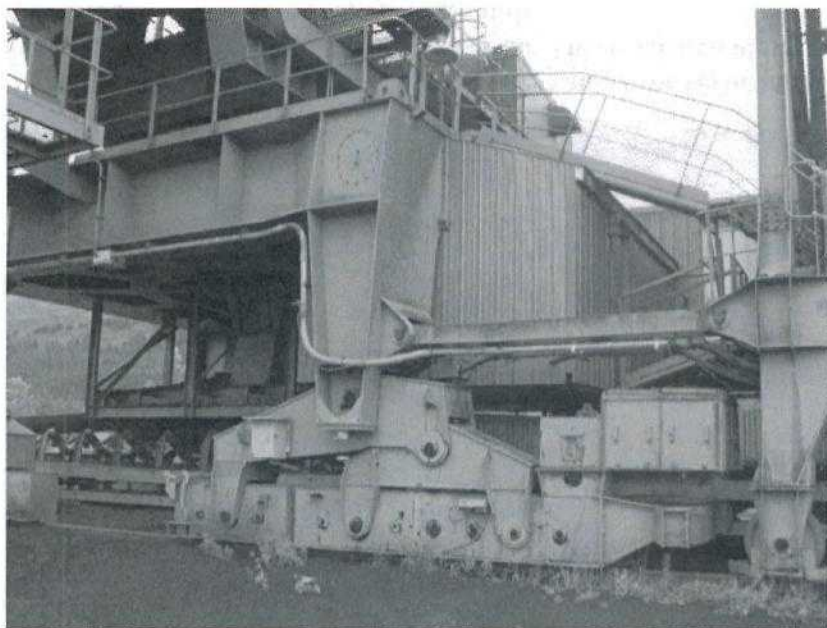
Description: Example of wind shields installed on the sides of conveyor BC-13. The Stacker/Reclaimer (below) moves along this conveyor line.

Time: 12:14 pm **Direction:** North

Photo No: 1030633

PHOTO DOCUMENTATION

Facility: Aurora Energy Services, LLC	Lat/Long: 60.1166/-149.4166	Inspection Date: 08/15/11
Location: Seward Coal Terminal, Seward, AK	Camera: Panasonic/Lumix DMC-FZ8	Photographer: John Pavitt, AOO/A



Description: Stacker/Reclaimer base, which moves on tracks alongside the two coal storage piles. Two water storage tanks were installed inside this unit for a new fogging sprinkler system.

Time: 12:19 pm **Direction:** West

Photo No: 1030634



Description: This is the working end of the Stacker/Reclaimer, which an operator uses to either add coal to the piles, or scoop it up to place on conveyor line BC-13 and send it to a ship for loading.

Time: 12:21 pm **Direction:** SE

Photo No: 1030636

PHOTO DOCUMENTATION

Facility: Aurora Energy Services, LLC	Lat/Long: 60.1166/-149.4166	Inspection Date: 08/15/11
Location: Seward Coal Terminal, Seward, AK	Camera: Panasonic/Lumix DMC-FZ8	Photographer: John Pavitt, AOO/A



Description: EPA Inspector Dave Terpening takes a close look at the water fogging spray bars which have just been activated at our request. The water fog helps reduce dust from the action of the buckets at the tip of the unit.

Time: 12:22 pm **Direction:** SE

Photo No: 1030638



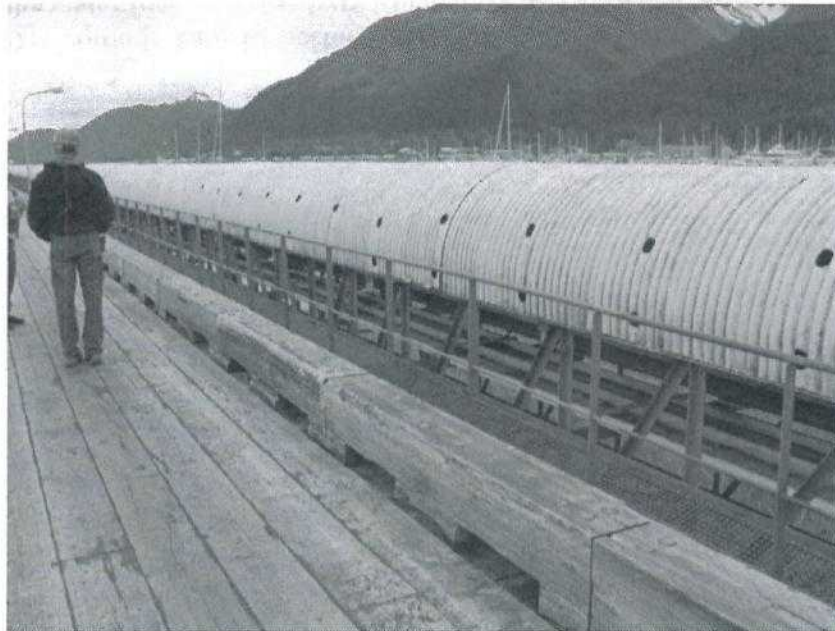
Description: Closer view of water fogging spray bars in action.

Time: 12:23 pm **Direction:** West

Photo No: 1030641

PHOTO DOCUMENTATION

Facility: Aurora Energy Services, LLC	Lat/Long: 60.1166/-149.4166	Inspection Date: 08/15/11
Location: Seward Coal Terminal, Seward, AK	Camera: Panasonic/Lumix DMC-FZ8	Photographer: John Pavitt, AOO/A



Description: Walking on the dock, alongside conveyor BC-14 where ships are loaded in Resurrection Bay. The conveyor line is covered.

Time: 1:32 pm **Direction:** walking south.

Photo No: 1030661



Description: Drip pans, recently installed beneath the conveyor line BC-14. These pans are intended to catch small particles of coal, which fall off on the underside of the belt.

Time: 1:32 pm **Direction:** W

Photo No: 1030662

PHOTO DOCUMENTATION

Facility: Aurora Energy Services, LLC	Lat/Long: 60.1166/-149.4166	Inspection Date: 08/15/11
Location: Seward Coal Terminal, Seward, AK	Camera: Panasonic/Lumix DMC-FZ8	Photographer: John Pavitt, AOO/A



Description: Conveyor BC-14 climbs up to drop coal onto a parallel line (at left), which then loads ships. White drip pans are still positioned beneath the conveyor belt at its southern end.

Time: 1:48 pm

Direction: Looking south, at ship loading area.

Photo No: 1030672



Description: Coal loading arm, which extends over the side of the dock and drops coal into the holds of ships. Not operating.

Time: 1:51 pm

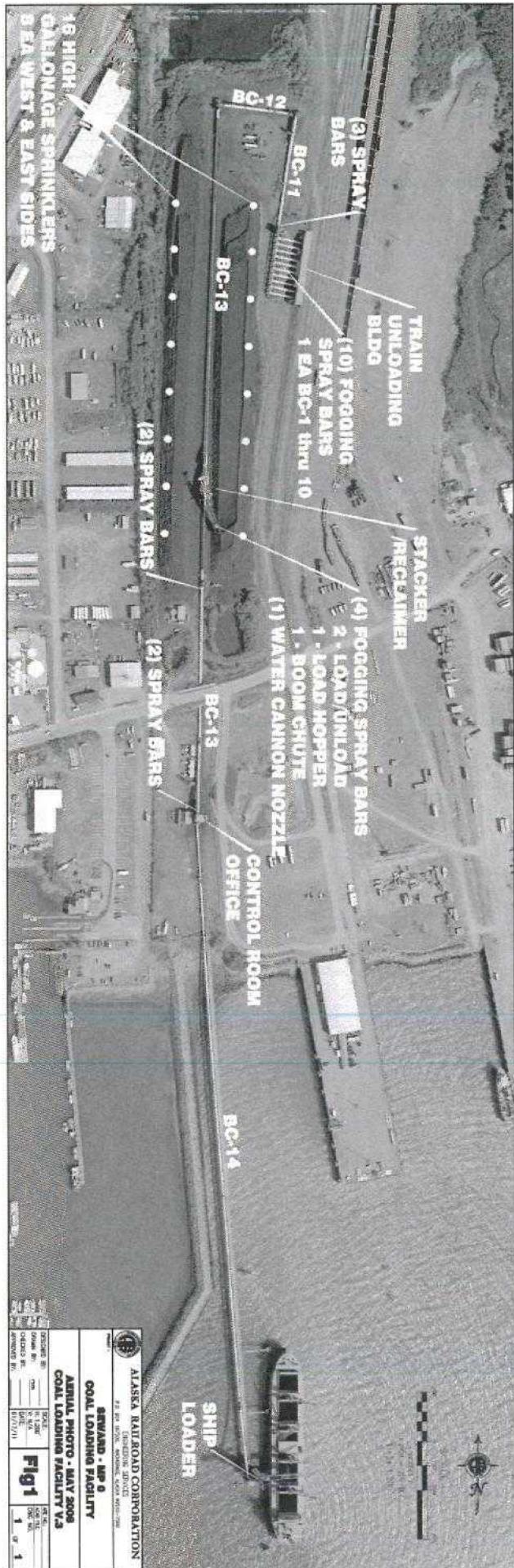
Direction: North. The cruise ship dock can be seen in background, on right.

Photo No: 1030674

PHOTO DOCUMENTATION

Facility: Aurora Energy Services, LLC	Lat/Long: 60.1166/-149.4166	Inspection Date: 08/15/11
Location: Seward Coal Terminal, Seward, AK	Camera: Panasonic/Lumix DMC-FZ8	Photographer: John Pavitt, AOO/A

ATTACHMENT 2



ATTACHMENT 3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

11 AUG 2004

Reply To
Attn Of: OAQ - 107

Mr. Matt C. Kelzenberg
Environmental & Regulatory Compliance
Alaska Railroad Corporation
327 West Ship Creek Avenue
Anchorage, Alaska 99510

Re: New Source Performance Standards, 40 CFR 60 Subpart Y Applicability Determination

Dear Mr. Kelzenberg:

This letter is in response to your requests dated May 5, 2004, concerning the applicability of the New Source Performance Standards (NSPS), 40 CFR 60 Subpart Y to Alaska Railroad Corporation's (ARRC) Seward Coal Terminal. Moreover, you requested the U.S. Environmental Protection Agency's (EPA) determination on whether your changing to a wider conveyor belt system and increasing the size of electric motors that drive the belts is considered a modification.

Based on the information provided, ARRC's Seward Coal Terminal contains only conveying equipments, an intermediate coal storage site, and coal transfer and loading systems. No coal preparing processes of breaking, crushing, screening, wet or dry cleaning, and thermal drying are performed at the facility. According to 40 CFR 60.251(a), any facility without the aforementioned coal preparing processes is not considered a coal preparation plant. Thus, ARRC's Seward Coal Terminal is not subject to this subpart.

In addition, ARRC requested EPA's determination on whether a project of changing the size of the conveyor belt system and the electric motors driving the belts is considered a modification. This question does not apply since Seward Coal Terminal does not fall within an NSPS source category.

If you should have any questions regarding this determination, please call Davis Zhen of my staff at (206) 553-7660.

Sincerely,

Jeff KenKnight, Manager
Federal and Delegated Air Programs Unit

cc: Jim Baumgartner, ADEC
John Kuterbach, ADEC
John Pavitt, EPA

ATTACHMENT 4

A. SCOPE AND APPLICABILITY

These procedures are to be used by ARRC/AES personnel to minimize dust at the Seward Terminal during active operations (ship loading, railcar unloading and stockpile management) from being emitted into ambient air. The intent of ARRC and AES is that these procedures comply with the requirements for reasonable precautions in 18 AAC 50.045(d).

A record keeping and public complaint tracking system is also included in these procedures.

B. METHOD SUMMARY

The precautions required under this Standard Operating Procedure include installed equipment, the maintenance and repair of that equipment, preventative procedures to evaluate and address dust generation, and responsive procedures in the event of potential dust emissions to the ambient air.

Preventative procedures to address dust emissions during active operations at the Seward Coal Terminal are accomplished by taking appropriate responsive action upon observation of dust generation that has the reasonable potential to be emitted into the ambient air. The appropriate responsive action is a stepped approach beginning with field observation and can include activities ranging from activation of the SCT water spray bars to ceasing operations, if required.

Preventative procedures to address dust emissions during long-term coal storage are accomplished by proper stockpile management. A facility sprinkler system is installed on-site as a seasonal back-up measure.

A recordkeeping and public complaint tracking program is included within the aforementioned procedures.

C. ACRONYMS

Alaska Department of Environmental Conservation (ADEC)
Alaska Rail Road Corporation (ARRC)
Aurora Energy Services (AES)
Compliance Order by Consent (COBC)
United States Environmental Protection Agency (EPA)
Seward Coal Terminal (SCT)
Standard Operating Procedure (SOP)
Control Room Operator (CRO)

D. TRAINING

This SOP is written for managers, foremen and operators of the SCT who will be responsible for operating the terminal in a manner that minimizes dust emissions from active operations at the coal terminal in compliance with Alaska's Air Quality Control regulations and other applicable federal, state or local laws or regulations, and documenting the preventative measures undertaken.

CRO's are responsible for making entries into the logbook located in the SCT control room (control room logbook) for their shift and are trained in general good recordkeeping practices such as writing legibly, not making erasures, initialing cross outs of errors, keeping logs in a bound and numbered book, and documenting weather and operating conditions. At the beginning of each shift, the responsible personnel sign and date the control room logbook.

Managers, Foremen, and other employees may be responsible for making field observations of dust/no dust and documenting those observations on an AES form. AES is using a modified EPA Method 22. This is not intended to be a formal EPA Method 22 reading; however, written materials from EPA Method 22 are used as a basis for the visual observation training provided to employees. Training includes: Process Units to be observed, observation position, observation distance, weather conditions, visual interferences, and recording observations properly on the AES Visual Determination form.

E. PROCEDURAL STEPS

1. Preventative Measures to Minimize Emissions during Train Unloading.

- i. Current weather conditions prior to train unloading are documented in the control room logbook.
- ii. Operational Measures
 1. Stacker/reclaimer operator, CRO's, foremen (either on site in the field or in the control room with binoculars) and other personnel are to be visually monitoring the outside of unloading building, conveyors and stacker/reclaimer for signs of dust generation.
 2. Although the operators and other AES employees are trained to report the generation of dust to the supervisor, on occasion the supervisor will check in with the operators to ensure no dust is being generated. This confirmation will be documented in the logbook.
 3. The coal is stacked by the stacker/reclaimer operator with a minimal drop distance from the boom to the stockpile.
- iii. If dust is observed by an operator or other personnel during train unloading,
 1. The General Foreman or the Field Supervisor is notified. An observer will be sent to the field to make an observation of the dust. In general, the employee making these observations will be the "Rover" position. However, AES has taken the position that dust prevention is the task of all employees - all employees will be trained to make and record a dust observation in the field that is documented on the AES Visual Determination form.

2. If dust is determined to be minimal and does not have the reasonable potential to be emitted into ambient air, no further action is required.
3. If, due to wind conditions, or otherwise, the dust has the reasonable potential to be emitted into ambient air, the CRO will be radioed to immediately turn on the spray bars upstream of the observed dust.
 - a. The results of the observation and activation of the spray bars are documented in a bound and numbered logbook kept in the control room.
 - b. Immediately thereafter the CRO calls for a follow-up field dust observation by a trained employee.
 - c. The field observer documents his or her readings on the AES Visual Determination form.
 - d. The CRO documents the results of the field observation in a logbook.
4. Based on the results of the field observation the CRO either calls for additional water spray and additional readings or orders active operations to cease until conditions improve.
5. At any time during the procedural steps listed above, the stacker/reclaimer operator can also suspend operations automatically from the operator seat.
- iv. If dust is not thereafter observed during unloading operations.
 1. Operations continue with stacker/reclaimer operator, and the Field Supervisor (either on in the field or in the control room with binoculars) and other personnel continue to visually monitoring the operations.
 - a. If conditions change such that dust is again observed, the General Foreman or the Field Supervisor is notified and the procedures listed under E. 1. iii.1-5 are implemented.

2. Preventative Measures to Minimize Dust Emissions During Ship Loading.

- i. Current weather conditions prior to ship loading are documented in the control room logbook.
- ii. Operational Measures
 1. The operators of the stacker/reclaimer, the ship loader, and the control room as well as other personnel are to be visually monitoring the stacker/reclaimer wheel, Tower 13 (sampler) and the ship loader for signs of dust generation.
 2. The ship loader minimizes the drop length from the drop tube to the hold of the ship, weather and wind conditions permitting.
 3. Although the operators and other AES employees are trained to report the generation of dust to the CRO, on occasion the CRO will check in with the operators to ensure no dust is being generated.

- a. This confirmation will be documented in the control room logbook.
 - iii. If dust is observed by an operator or other personnel during ship loading.
 - 1. The CRO is notified. An observer will be sent to the field to make an observation of the dust. In general, the employee making these observations will be the "Rover" position. However, AES has taken the position that dust prevention is the task of all employees – all employees will be trained to make and record a dust observation in the field that is documented on the AES Visual Determination form.
 - 2. If dust is determined to be minimal and does not have the reasonable potential to be emitted into ambient air, no further action is required.
 - 3. If, due to wind conditions, or otherwise, the dust has the reasonable potential to be emitted into ambient air, the CRO will be radioed to immediately turn on the spray bars upstream of the observed dust.
 - a. The results of the observation and activation of the spray bars are documented in a bound and numbered logbook kept in the control room.
 - b. Immediately thereafter the CRO calls for a follow-up field dust observation by a trained employee.
 - c. The field observer documents his or her readings on the AES Visual Determination form.
 - d. The CRO documents the results of the field observation in the control room logbook.
 - 4. Based on the results of the field observation, the CRO either calls for additional water spray and additional readings or orders to cease active operations until conditions improve.
 - 5. At any time during the procedural steps listed above, the stacker/reclaimer operator or ship loader can also suspend operations automatically from the operator seat.
 - iv. If dust is not thereafter observed during ship loading,
 - 1. Operations continue with stacker/reclaimer operator, ship loader operator, CRO and other personnel visually monitoring the operations.
 - a. If conditions change such that dust is again observed, the General Foreman or the Field Supervisor is notified and the procedures listed under E. 2. iii. 1.-5 are implemented.

3. Preventative Measures to Minimize Dust Emissions From Coal Stockpiles.

- i. Stockpile Geometry:
 - 1. The stockpiles are aligned in the direction of the prevailing winds to minimize surface area and wind angle.
- ii. Dressing and shaping of the stockpiles is minimized.

- iii. Compaction is done to minimize the heating of the piles.
- iv. The stockpiles are not rotated unless required due to heat build-up.
- v. A field observer will be available at all times during stockpile dozing.
 - a. If dust is observed by the dozer operator or the observer to have the reasonable potential to be emitted into ambient air, one or more preventative dust measures will be implemented to address the dust emissions including:
 - i. Fire or garden hose aimed at the pile
 - ii. Change in direction to minimize wind effects
 - iii. Reduce the speed of the dozer
 - iv. Turn on water cannons as needed and available
 - b. Should the fugitive emissions remain uncontrollable after the preventative measures have been undertaken, the dozer operations will cease until conditions change except when necessary to control spontaneous combustion.
 - c. This information is documented in the control room logbook.
 - d. The field observer documents his or her readings on the AES Visual Determination form. Those forms are to be kept together in a binder located in the office.
- vi. The stockpile water cannons are to remain in working condition for seasonal use.

F. RECORD KEEPING AND REPORTING

1. Record Management

- i. A bound and numbered logbook is kept in the control room. This logbook is the running documentary of weather and operational conditions, notations of reported dust observations, and any corrective measures, if necessary. The logbook also has the documentation of any complaints received.
- ii. Field observation sheets of dust/no dust readings are kept in a file in the office. A copy of the "Field Observation of Dust/No Dust" form is included in the Appendices of this SOP.
- iii. A NOAA weather site is in the near vicinity. Records from this site are available online should they be required.
- iv. Training records are on file in the office and are kept in the control room logbook.

2. Complaints About Dust Emissions

- i. All coal dust complaints received: 1) directly at the terminal in writing, 2) via a telephone line or email dedicated for receipt of complaints the number and address of which are posted on the ARRC website, or 3) directly by one of the following ARRC or AES managers Robert Brown -- AES General Manager, Victor Stoltz -- AES General Foreman, Shelli Knopik -- AES Office Manager; Paul Farnsworth -- ARRC Director of

Facilities; will be documented and noted in the logbook and on the AES Dust Complaint form. The AES Complaint form must include the following elements: The date, time, contact information (e.g., telephone number, address, email, etc.), name of the person making the dust complaint.

- ii. If a dust complaint is deemed valid by the facility personnel, appropriate corrective action will be promptly undertaken, and a description of such corrective measures will be documented on the Dust Complaint form, including a timeline showing facility actions immediately prior to and after the time of the dust complaint.
- iii. If a dust complaint is deemed invalid by facility personnel, a description of why ARRC/AES believes the dust complaint is not valid will be documented on the Dust Complaint form.
- iv. All dust complaints received under F.2.i above shall (a) be orally reported to the ADEC within 24 hours and include transmittal via fax or email of a copy of the Dust Complaint form, and (b) with a follow-up written submission provided to ADEC with five (5) days, including copies of relevant pages from the control room logbook and any AES Visual Determination form. This requirement is in addition to any semi-annual reporting requirement of the COBC.

3. Records Retention

- i. All records generated, created, maintained, or received by ARRC/AES in connection with this SOP shall be retained at the facility until termination of the COBC and available to ADEC as otherwise provided for in the COBC.

G. REFERENCES

- 1. 40 CFR 60, Appendix A, EPA Method 22 (Visual Determination of Fugitive Emissions from Material Sources and Smoke Emissions from Flares)
- 2. EPA Guidance for Preparing Standard Operating Procedures EPA QA/G-6
- 3. Alaska Statutes Titles 44 and 46
- 4. Alaska Administrative Code 18 AAC 50 et seq.

H. APPENDICES

- 1. AES Visual Determination of Dust Emissions Form
- 2. Written Training Materials Used for Dust/No Dust Readings
- 3. AES Complaint Form

AES

Aurora Energy Services, LLC

PO Box 1789 • Seward, Alaska 99664
Telephone (907) 224-1128 • Facsimile (907) 224-1911

Visual Determination of Dust Emissions

____ / ____ / ____
Month / Day / Year

Operation

☐ Train Unloading

☐ Ship Loading

Process Unit Observed

☐ Stack/Reclaimer

☐ Ship Loader

☐ Sampler

☐ Unloading Building

Observation Time	Wind Direction/Speed	Sky Conditions	Dust Observed? Y or N	Dust Leaving Property? Y or N	Controls Operating	Point of Observation/Comments
	/					
	/					
	/					
	/					
	/					
	/					
	/					
	/					
	/					
	/					
	/					
	/					
	/					
	/					
	/					

Signature _____

Date _____

Aurora Energy Service, LLC
Dust Prevention Training

Annual training will be provided for all levels of personnel at the facility using the "Prevention of Dust Emissions at the Seward Coal Terminal Standard Operating Procedure" (SOP) as the guiding document. The training will cover a subset of the following subjects as needed for individual levels of responsibility:

• **Employee Responsibilities**

All employees:

- Notify supervisor when dust is being generated from facility operation. Every employee needs to know the Rover position responsibilities.

Safety officer:

- Train new employees on fugitive dust awareness when initial training is conducted.

Field Supervisor:

- Report any dust notifications to General Foreman.
- Perform duties of General Foreman in his absence.
- Observe facility for dust generation during operation.
- Direct manpower and equipment to take corrective action as necessary.

General Foreman:

- Upon notification or observation of dust generation, evaluate the situation to determine whether or not dust is leaving the facility.
- If dust is leaving the facility, direct manpower and equipment to take corrective actions to mitigate dust generation.
- If corrective actions are not effective determine whether or not to curtail operation.
- Provide annual training on fugitive dust awareness and mitigation measures.
- Communicate dust conditions to General Manager.
- Perform Method 22 training

General Manager:

- Perform initial annual training
- Support decisions of General Foreman

• **Record Keeping**

- Refer to section F of the SOP

• **Corrective Actions**

- Refer to section E of the SOP

• **Method 22**

- Refer to sections E and F of the SOP for applicability
- Training to be given annually to employees

METHOD 22 - VISUAL DETERMINATION OF FUGITIVE EMISSIONS
FROM MATERIAL SOURCES AND SMOKE EMISSIONS FROM FLARES

NOTE: This method is not inclusive with respect to observer certification. Some material is incorporated by reference from Method 9.

1.0 Scope and Application.

This method is applicable for the determination of the frequency of fugitive emissions from stationary sources, only as specified in an applicable subpart of the regulations. This method also is applicable for the determination of the frequency of visible smoke emissions from flares.

2.0 Summary of Method.

2.1 Fugitive emissions produced during material processing, handling, and transfer operations or smoke emissions from flares are visually determined by an observer without the aid of instruments.

2.2 This method is used also to determine visible smoke emissions from flares used for combustion of waste process materials.

2.3 This method determines the amount of time that visible emissions occur during the observation period (i.e., the accumulated emission time.) This method does not require that the opacity of emissions be determined. Since this procedure requires only the determination of whether

visible emissions occur and does not require the determination of opacity levels, observer certification according to the procedures of Method 9 is not required. However, it is necessary that the observer is knowledgeable with respect to the general procedures for determining the presence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training is to be obtained from written materials found in References 1 and 2 or from the lecture portion of the Method 9 certification course.

3.0 Definitions.

3.1 *Emission frequency* means the percentage of time that emissions are visible during the observation period.

3.2 *Emission time* means the accumulated amount of time that emissions are visible during the observation period.

3.3 *Fugitive emissions* means emissions generated by an affected facility which is not collected by a capture system and is released to the atmosphere. This includes emissions that (1) escape capture by process equipment exhaust hoods; (2) are emitted during material transfer; (3)

are emitted from buildings housing material processing or handling equipment; or (4) are emitted directly from process equipment.

3.4 *Observation period* means the accumulated time period during which observations are conducted, not to be less than the period specified in the applicable regulation.

3.5 *Smoke emissions* means a pollutant generated by combustion in a flare and occurring immediately downstream of the flame. Smoke occurring within the flame, but not downstream of the flame, is not considered a smoke emission.

4.0 *Interferences.*

4.1 Occasionally, fugitive emissions from sources other than the affected facility (e.g., road dust) may prevent a clear view of the affected facility. This may particularly be a problem during periods of high wind. If the view of the potential emission points is obscured to such a degree that the observer questions the validity of continuing observations, then the observations shall be terminated, and the observer shall clearly note this fact on the data form.

5.0 *Safety.*

5.1 *Disclaimer.* This method may involve hazardous materials, operations, and equipment. This test method may not address all of the safety problems associated with its

use. It is the responsibility of the user of this test method to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to performing this test method.

6.0 *Equipment.*

6.1 *Stopwatches (two).* Accumulative type with unit divisions of at least 0.5 seconds.

6.2 *Light Meter.* Light meter capable of measuring illuminance in the 50 to 200 lux range, required for indoor observations only.

7.0 *Reagents and Supplies.* [Reserved]

8.0 *Sample Collection, Preservation, Storage, and Transfer.*
[Reserved]

9.0 *Quality Control.* [Reserved]

10.0 *Calibration and Standardization.* [Reserved]

11.0 *Analytical Procedure.*

11.1 *Selection of Observation Location.* Survey the affected facility, or the building or structure housing the process to be observed, and determine the locations of potential emissions. If the affected facility is located inside a building, determine an observation location that is consistent with the requirements of the applicable regulation (*i.e.*, outside observation of emissions escaping the building/structure or inside observation of emissions

directly emitted from the affected facility process unit). Then select a position that enables a clear view of the potential emission point(s) of the affected facility or of the building or structure housing the affected facility, as appropriate for the applicable subpart. A position at least 4.6 m (15 feet), but not more than 400 m (0.25 miles), from the emission source is recommended. For outdoor locations, select a position where the sunlight is not shining directly in the observer's eyes.

11.2 Field Records.

11.2.1 Outdoor Location. Record the following information on the field data sheet (Figure 22-1): Company name, industry, process unit, observer's name, observer's affiliation, and date. Record also the estimated wind speed, wind direction, and sky condition. Sketch the process unit being observed, and note the observer location relative to the source and the sun. Indicate the potential and actual emission points on the sketch.

11.2.2 Indoor Location. Record the following information on the field data sheet (Figure 22-2): Company name, industry, process unit, observer's name, observer's affiliation, and date. Record as appropriate the type, location, and intensity of lighting on the data sheet. Sketch the process unit being observed, and note the

observer location relative to the source. Indicate the potential and actual fugitive emission points on the sketch.

11.3 Indoor Lighting Requirements. For indoor locations, use a light meter to measure the level of illumination at a location as close to the emission source(s) as is feasible. An illumination of greater than 100 lux (10 foot candles) is considered necessary for proper application of this method.

11.4 Observations.

11.4.1 Procedure. Record the clock time when observations begin. Use one stopwatch to monitor the duration of the observation period. Start this stopwatch when the observation period begins. If the observation period is divided into two or more segments by process shutdowns or observer rest breaks (see Section 11.4.3), stop the stopwatch when a break begins and restart the stopwatch without resetting it when the break ends. Stop the stopwatch at the end of the observation period. The accumulated time indicated by this stopwatch is the duration of observation period. When the observation period is completed, record the clock time. During the observation period, continuously watch the emission source. Upon observing an emission (condensed water vapor is not considered an emission), start the second accumulative stopwatch; stop the watch when the emission stops. Continue

this procedure for the entire observation period. The accumulated elapsed time on this stopwatch is the total time emissions were visible during the observation period (i.e., the emission time.)

11.4.2 Observation Period. Choose an observation period of sufficient length to meet the requirements for determining compliance with the emission standard in the applicable subpart of the regulations. When the length of the observation period is specifically stated in the applicable subpart, it may not be necessary to observe the source for this entire period if the emission time required to indicate noncompliance (based on the specified observation period) is observed in a shorter time period. In other words, if the regulation prohibits emissions for more than 6 minutes in any hour, then observations may (optional) be stopped after an emission time of 6 minutes is exceeded. Similarly, when the regulation is expressed as an emission frequency and the regulation prohibits emissions for greater than 10 percent of the time in any hour, then observations may (optional) be terminated after 6 minutes of emission are observed since 6 minutes is 10 percent of an hour. In any case, the observation period shall not be less than 6 minutes in duration. In some cases, the process operation may be intermittent or cyclic. In such cases, it

may be convenient for the observation period to coincide with the length of the process cycle.

11.4.3 Observer Rest Breaks. Do not observe emissions continuously for a period of more than 15 to 20 minutes without taking a rest break. For sources requiring observation periods of greater than 20 minutes, the observer shall take a break of not less than 5 minutes and not more than 10 minutes after every 15 to 20 minutes of observation. If continuous observations are desired for extended time periods, two observers can alternate between making observations and taking breaks.

11.5 Recording Observations. Record the accumulated time of the observation period on the data sheet as the observation period duration. Record the accumulated time emissions were observed on the data sheet as the emission time. Record the clock time the observation period began and ended, as well as the clock time any observer breaks began and ended.

12.0 Data Analysis and Calculations.

If the applicable subpart requires that the emission rate be expressed as an emission frequency (in percent), determine this value as follows: Divide the accumulated emission time (in seconds) by the duration of the observation period (in seconds) or by any minimum

observation period required in the applicable subpart, if the actual observation period is less than the required period, and multiply this quotient by 100.

13.0 Method Performance. [Reserved]

14.0 Pollution Prevention. [Reserved]

15.0 Waste Management. [Reserved]

16.0 References.

1. Missan, R., and A. Stein. Guidelines for Evaluation of Visible Emissions Certification, Field Procedures, Legal Aspects, and Background Material. EPA Publication No. EPA-340/1-75-007. April 1975.

2. Wohlschlegel, P., and D.E. Wagoner. Guideline for Development of a Quality Assurance Program: Volume IX-- Visual Determination of Opacity Emissions from Stationary Sources. EPA Publication No. EPA-650/4-74-005i. November 1975.

17.0 Tables, Diagrams, Flowcharts, and Validation Data.

FUGITIVE OR SMOKE EMISSION INSPECTION OUTDOOR LOCATION			
Company Location Company Rep.	Observer Affiliation Date		
Sky Conditions Precipitation	Wind Direction Wind Speed		
Industry	Process Unit		
Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.			
OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
End Observation	_____	_____	_____

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION INDOOR LOCATION			
Company Location Company Rep	Observer Affiliation Date		
Industry	Process Unit		
Light type (fluorescent, incandescent, natural) Light location (overhead, behind observer, etc.) Illuminance (lux or footcandles) Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.			
OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
End Observation	_____	_____	_____

Figure 22-2

AES Complaint Form

Date _____ Time _____ Complainant(s) _____ Contact Info. (Phone, email, etc.) _____

1. Description of Event Information

START Time: _____ END Time: _____
Location: _____

2. Activities Involved

<input type="checkbox"/> Train Unloading	<input type="checkbox"/> Sampler
<input type="checkbox"/> Stockpile Loading	<input type="checkbox"/> Conveyor No.
<input type="checkbox"/> Stockpile Unloading	<input type="checkbox"/> Transfer Point
<input type="checkbox"/> Ship Loading	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

3. Operational Conditions Which Contributed to Complaint

Provide a detailed description of what happened. Attach additional sheets as necessary.

4. Ambient Conditions Which Contributed to the Complaint

5. Describe Measures Taken to Immediately Address the Complaint

6. Describe Measures to Address Future Complaints

7. Describe Any Reason the Complaint Event May Not Be a Violation

8. Attachments

<input type="checkbox"/> Logbook Pages (# _____ through _____)
<input type="checkbox"/> Visual Determination of Dust Emissions Logs
<input type="checkbox"/> Other _____
<input type="checkbox"/> Other _____
<input type="checkbox"/> Other _____

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name _____

Signature _____

Date _____

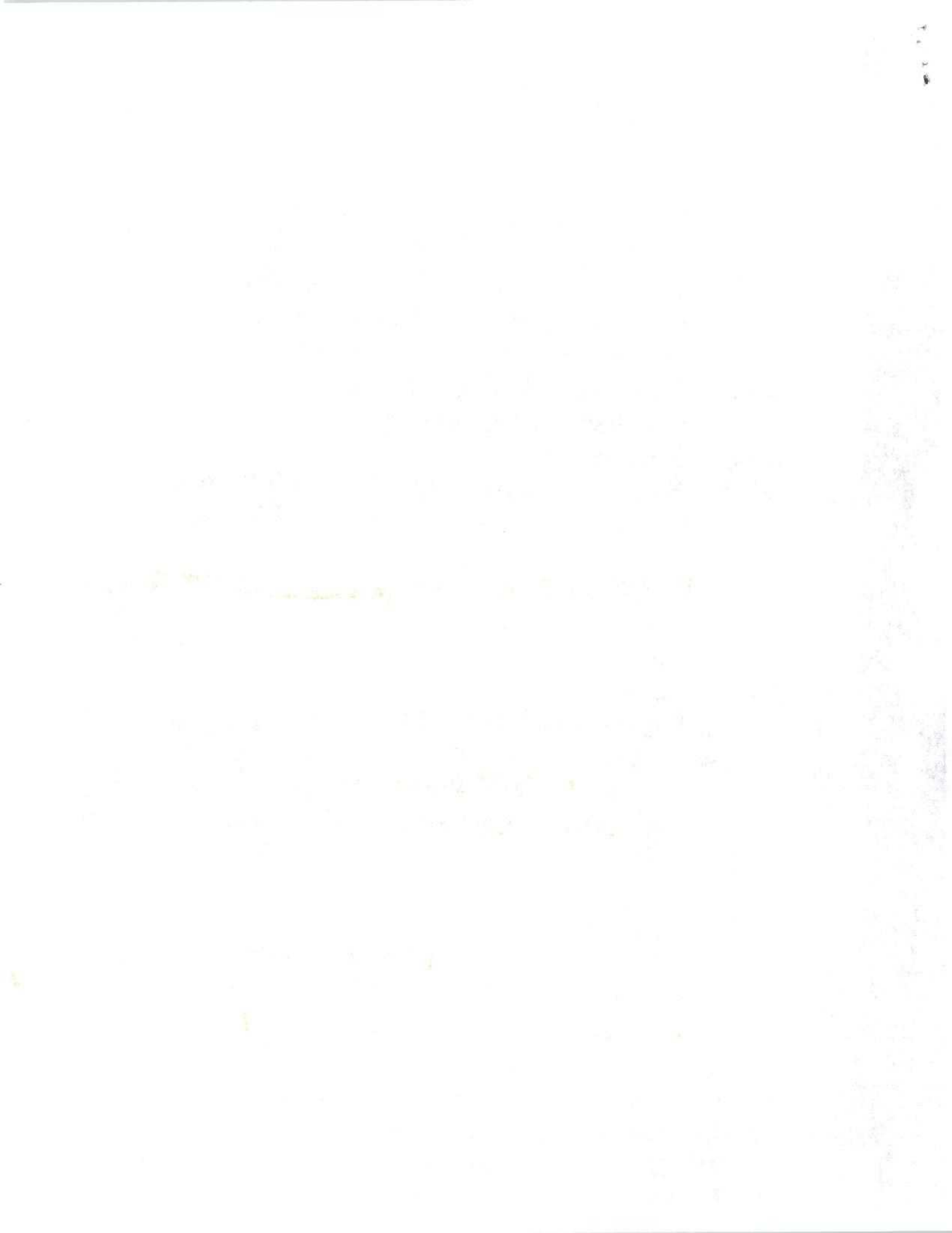
AES Complaint Form

Submit to General Foreman: Fax: (907) 224-3931 Telephone: (907) 224-3122 Email: aes@seward.net

ATTACHMENT 5

Cony Mary

- Sat. Jan. 22, 2011 35°F, 8mph NW, 0 precip
- 14:30 No visible dust, SEP 2-6 on, BCII waterspray on Fogging on S/R, Firehose
- 15:00 No visible dust, SEP 2-6 on, BCII waterspray on, Fogging on S/R, Firehose on S/R
- 15:30 No visible dust, SEP 2-6 on, BCII waterspray on, Fogging on S/R, Firehose on S/R
- 15:55 Stop bypass switching Train
- 15:57 Start reclaiming, No visible dust, Fire Hose on S/R, Fogging on S/R
- 16:38 Stop reclaiming
- 16:48 Resume Bypassing, No visible dust, SEP 2-6 on, BC-11 spray on, Firehose on S/R, Fogging system on S/R
- 17:05 Dust observed at S/R, not leaving property, SEP 2-6 on, BC-11 water on, Firehose on S/R, Fogging on S/R, Two spraybars on BC13
- Jan 22, 2010 by-pass to ship Erie Bluff
- 17:15 Dusty conditions, 4 spray bars BC 11, 1 Fire hose & 4 spray bars S/R boom, 3 spray bars BC 13, shut down hoppers to make adjustments to control dust SEP 1-6
- 17:20 Start Hoppers #1 & #2 will observe closely
- 17:24 Hoppers #1 & #2 are empty, start #3, will observe closely, dusty conditions, all water bars on, stop unloading to drain hoppers, will skip 2 cars
- 17:30 Dumped 1 car, dusty conditions
- 17:40 Skipped 3 cars will dump another car
- 17:48 Using Hoppers #2 & #3 only
- 18:05 Stop unloading due to uncontrollable dusty conditions.
- ~~18:15~~



ATTACHMENT 6

AES

Aurora Energy Services, LLC

PO Box 1789 • Seward, Alaska 99664
Telephone (907) 224-3120 • Facsimile (907) 224-3931

Visual Determination of Dust Emissions

1 / 22 / 11

Month / Day / Year

Operation

☐ Train Unloading

☐ Ship Loading

☒ Bypass

Process Unit Observed

☐ Stacker/Reclaimer

☐ Sampler

☒ Ship Loader

☐ Unloading Building

Observation Time	Wind Direction/Speed	Sky Conditions	Dust Observed? Y or N	Dust Leaving Property? Y or N	Controls Operating	Point of Observation/Comments
13:48	NW 7	Ptly cldy	N	N	S/R X 4, 1-6 BC-11 X 3 BC-13 X 2	West Breakwater towards ship
1440	NW 7	PC	N	N	1-6 FOG S/R BARS BC-11 3 BARS	SOFT E S/R WHITE BG
1715	NW 15	CLEAR	Y	Y	BC-11 4 BARS 1-6 S/R S/R WHITE	SOFT E S/R BLUE BG
	/					STOPPED CALLING OUT DUST HEADING TOWARDS RR TRACKS
	/					
	/					
	/					
	/					
	/					
	/					
	/					
	/					
	/					

CRH
CRH
CRH

Rocky Elwood
Signature

1/22/11
Date

